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June 3, 2024

VIA ELECTRONIC MAILING: kellie_otis@nhd.uscourts.gov

U.S. District Court
55 Pleasant Street, Room 110
Concord, NH 03301

**RE : Armendariz, et al v. Sig Sauer, Inc.
United States District Court for the District of New Hampshire
Civil Action No.: 1:22-cv-536-JL**

Your Honor:

This is a letter submitted jointly by the parties. The parties held a telephone conference on May 24, 2024, to discuss the use of a short form complaint and a cut-off date for Plaintiff to add new cases to consolidate under the existing case management order. The parties set forth the following plan.

Plaintiff drafted and circulated a Short Form Complaint and incorporated Defendant's edits. The draft Short Form Complaint that the Parties agreed to is attached.

The parties agreed that Plaintiff will file Short Form Complaints in *Armendariz v. Sig Sauer*, Case No. 1:22-cv-00536-JL for all plaintiffs named in *Boschers v. Sig Sauer*, Case No. 1:24-cv-00089 and in *Harp v. Sig Sauer*, Case No. 1:24-cv-00058. There are seven Plaintiffs in the Harp complaint and five loss-of-consortium plaintiffs ("LOC Plaintiffs"). Sig

Sauer will waive any statute of limitations defenses for the Plaintiffs in *Boschers* and *Harp* whose complaints were already filed. Once the Short Form Complaints referenced above are filed and accepted in *Armendariz*, Plaintiffs' counsel will withdraw the *Boschers* and *Harp* complaints.

The parties further agree that Plaintiffs will have until June 30, 2024, to bring new actions against Sig Sauer to be consolidated under this Court's case management order in the matter of *Armendariz*. Plaintiff has represented to Defendant and represents to the Court that there will be less than five added within this time frame, and all others will be filed thereafter.

With respect to actions filed after June 30, 2024, the parties agree to continue utilizing the Short Form Complaint but defer to the Court's preference of whether to continue to file these actions into the existing consolidated action (to be subject to a second case management order), or file a separate action for post-June 30, 2024, cases so a case management order can be generated on a separate docket.

Should the Court wish to discuss this or any other issue, we remain available. We thank Your Honor for your consideration.

Respectfully submitted,
/s/Robert W. Zimmerman
ROBERT W. ZIMMERMAN

RWZ/cg